

California Department of Public Health Document Review and Approval Guidelines



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Director

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Introduction

These guidelines outline California Department of Public Health (CDPH) policies regarding the approval and dissemination of documents for external release. The goal of the guidelines is to ensure that information released externally by CDPH has received the appropriate level of review and approval. The guidelines are incorporated by reference into the Public Health Administrative Manual. All CDPH employees producing, reviewing, or approving documents for external release must comply with these guidelines.

These guidelines cannot answer every question that may arise with regard to every document. When questions arise, document authors should seek guidance from their supervisors. Authors, supervisors, managers, and Deputy Directors all share responsibility for following these guidelines and obtaining required approvals.

We encourage user feedback and suggestions. Please direct comments to:

CDPH Office of Public Affairs
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Categories of Documents Intended for External Release

For the purposes of these guidelines, CDPH has identified the following categories of documents intended for external release. The categories are purposefully broad to cover most materials produced by CDPH. Managers should use their professional judgement in determining which category is applicable to a given document.

Audit Reports

- Periodic
- Mandated by State Administrative Manual

Example:

- Biennial Internal Control Reporting

Clinical Guidelines

- One-time, periodic, or occasional

Examples:

- Interim Guidance for Clinicians on Identifying and Caring for Patients with Swine-origin Influenza A (H1N1) Virus Infection
- Guideline: Prevention And Control Of Antibiotic Resistant Microorganisms
California Long-Term Care Facilities

Data Reports/Tables

- One-time or recurring
- Tabular or graphic presentations of data/information
- Minimal narrative and/or analysis of data

Examples:

- County Health Status Profiles
- Vital Statistics of California
- Routine disease surveillance report

Data Sets

- Public use subsets of program databases
- Data stored in electronic data files (tape, diskette, CD-ROM, etc., with documentation)

Example:

- California Births by ZIP Code

Fiscal Reports

- One-time or periodic
- Focus on budget, fees, monetary penalties, or other fiscal issues

Examples:

- Governor's Budget Highlights
- Health Facility License Fees Annual Fee Report

Health Education/Communication

- One-time, periodic, or occasional
- Provides factual information to the public or target audience to prevent disease or improve health status
- Conveys a specific public health message to a select target audience about a specific public health problem or program

Examples:

- Brochure
- Fact sheet
- Media advertisements
- Newsletters/articles
- Press release or other press materials
- Public Service Announcement
- Social Media – Facebook, Twitter, YouTube, etc.

Legislative Reports

- One-time or periodic
- Legislatively mandated

Examples:

- Report to the Legislature -- California Public Health Laboratory Director Training Program: Educating and Training California's Future Public Health Laboratory Directors
- Report to the Legislature: Baseline Evaluation of Staffing and Quality of Care Indicators in Skilled Nursing Facilities (SNFs)

Policy Statement for External Partners

- One-time or recurring
- Reflect new information or changes in requirements for facilities or entities regulated by or doing business with CDPH

Examples:

- Licensing and Certification All Facilities Letter
- Office of Vital Records All County Letter

Prevention/Response Strategic Plan

- One-time, periodic, or occasional
- Program, project, or issue specific
- Includes strategies, goals, or objectives for addressing a health problem or issue

Examples:

- Pandemic Influenza Preparedness and Response Plan
- California Obesity Prevention Plan
- California's Master Plan for Heart Disease and Stroke Prevention and Treatment

Program Description/Evaluation/Annual Report

- One-time or recurring
- Program or project specific
- Designed to educate others about program and/or to evaluate and improve program operations and outcomes

Examples:

- Program outcomes report
- Profile of client populations
- End of year summary or annual report

Regulations

- usually statutorily mandated

Examples:

- Revised Drinking Water Standard for Arsenic
- Testing Standards for Laboratories Performing HIV Screening

Research/Special Studies

- One-time

- Science-based
- Intended for journal publication or release by CDPH

Examples:

- Abstract for oral or poster presentation
- Manuscript for peer-reviewed journal
- Report of research findings, published by CDPH
- Oral presentation of previously approved material
- Letter to editor of journal
- Oral presentation of new material
- Chapter in textbook/anthology
- Joint report, developed with another organization
- Disaster investigation
- Disease cluster investigation
- Risk factor study

Survey Results

- One-time, periodic, or occasional
- General population, target populations, clients, vendors, or other
- Descriptive statistics or reports based on analysis of data

Examples:

- California Behavioral Risk Factor Survey
- California Women's Health Survey
- California Women, Infants, & Children Participant Food Shopping and Consumption Habits Survey

Testimony

- Written or oral

Examples:

- Congress
- State Legislature
- Local government board, council, or commission
- Oversight entity such as Little Hoover Commission

Review and Approval of Documents Intended for External Release

All documents prepared by or under the auspices of CDPH for external release, in print or other media, via the Internet, or as part of an oral presentation, must undergo appropriate review and approval prior to release. Please note this includes documents produced by other organizations using CDPH funding. CDPH contracts with such organizations should clearly state the approval requirements for documents produced under the contract. Documents produced by CDPH or its contractors and intended for publication by an entity outside of the department (e.g., in a medical or scientific journal)

must receive the necessary departmental approvals prior to submission to the external publisher. Concurrent submission to the internal and external review processes is not permitted.

Inappropriate release of any document will result in the responsible Deputy Director forfeiting his or her delegated authority to approve any documents for external release.

Inappropriate release includes failure to exercise due diligence in identifying and submitting to the Director sensitive documents and failure to submit to the Director any document that appears on the table below as routinely requiring Director's approval.

Sensitive and Non-Sensitive Documents

All documents that meet one or more of the criteria listed in the next section on sensitive documents require review and approval by the Director prior to release or submission for publication. Sensitive documents may also require review and approval by the California Health and Human Services Agency (CHHS) and the Governor's Office. The Director will determine the need for such approval.

Most non-sensitive documents may be approved for release by the appropriate Deputy Director. Deputy Directors may delegate their approval authority for non-sensitive documents to subordinates but retain responsibility for any consequences of inappropriate release.

Sensitive Documents

All documents that meet one or more of the criteria listed below are potentially sensitive and require review and approval by the Director prior to external release or submission for publication. Sensitive documents may also require review and approval by the California Health and Human Services Agency (CHHS) and the Governor's Office. The Director will determine the need for such approval.

Deputy Directors are responsible for forwarding all sensitive documents to the Director for approval prior to external release or submission for publication. Any external release or submission for publication of a sensitive document prior to approval from the Director will result in the Deputy Director losing his or her delegated authority to approve non-sensitive documents.

Criteria for Determining if a Document May Be Sensitive

- Is the document mandated by the Legislature, an auditing entity, or other entity outside CDPH? Examples would include a health information pamphlet required by legislation, a periodic report describing actions taken to address audit findings, a response to a Little Hoover Commission report, etc.
- Does the document make explicit or implicit policy recommendations?

- Does the document make recommendations that have a fiscal impact (to CDPH, the State, stakeholders, or others)?
- Is the document likely to attract media attention (either positive or negative) or is the issue subject to ongoing media interest?
- Is there legislation pending or recently passed related to the subject of the document? Has a legislator held or scheduled hearings on the subject of the document? Is the document likely to attract legislative interest?
- Does the document address sensitive or controversial issues? Consider economic, political, public, stakeholder, jurisdictional, and Administration sensitivities.

If you answer “yes” to any one of the above questions, your document needs to be elevated to the Director for review. Deputy Directors are responsible for ensuring that the sensitivity review occurs at an appropriate level by staff with sufficient experience and judgement to assess the document.

Forward sensitive documents and those requiring Director review per the table below to the Director’s Office with a Secretary’s Action Requested (SAR). If the table below indicates a document needs review by another entity in CDPH (Budgets, Legislative and Governmental Affairs, Office of Public Affairs, etc.), route the SAR to that entity for sign off prior to the routing to the Director. The SAR will facilitate forwarding to Agency should the Director deem that necessary. If the Director provides final review and approval, the Director or his or her designee will sign the SAR and return it to program.

The SAR should contain the following information:

- Document title
- Originating program
- Contact point in program for questions
- Any external due date (legislative mandate, submission deadline, etc.)
- Anticipated publication date
- If prepared for submission to a journal or other external publisher, name of journal or publisher
- Brief summary of the document (main conclusions/findings/recommendations)
- Brief summary of policy or fiscal implications of the document, with document page references if applicable; If possible, estimate fiscal implications and indicate who would bear the costs (State, counties, other)
- Brief discussion of sensitive issues raised by the document and likely reaction of interested/affected stakeholders
- Roll out plan, if any: Will there be a press release or other notice of publication? Do you anticipate media inquiries?
- All necessary attachments

Non-Sensitive Documents

The table below indicates, by document type, the required level of review and approval for most non-sensitive documents. **Even though a document type appears on this list as non-sensitive, any individual document is sensitive if it meets any of the criteria listed above under the heading “Sensitive Documents” and should be handled according to the “Sensitive Documents” guidelines**

| Review and Approval Requirements for Non-Sensitive Documents Intended for External Release | | | | |
|--|---|-----------------------------|---------|----------|
| Document Type | Examples | Review/Approval Requirement | | |
| | | Deputy Director | Other | Director |
| Audit Reports | | | | |
| | Biennial Internal Control Reporting | X | IA | |
| Clinical Guidelines | | | | |
| | | X | | |
| Data Reports/Tables | | | | |
| | County Health Status Profiles | X | OPA | X |
| | Vital Statistics of California | X | OPA | |
| | Routine disease surveillance data report | X | OPA | |
| Data Sets | | | | |
| | California Births by ZIP Code | X | | |
| Fiscal Reports | | | | |
| | Governor’s Budget Highlights | X | Budgets | X |
| | Fee Report | X | Budgets | X |
| Health Education/Communication | | | | |
| | Brochure, poster, flier | X | OPA | |
| | Fact sheet, FAQ’s | X | OPA | |
| | Media ads including TV, radio, print | X | OPA | X |
| | Newsletters/articles | X | | |
| | Press release, all press materials, TPs | X | OPA | X |
| | Public Service Announcements | X | OPA | X |
| | Social Media – Facebook, Twitter | X | OPA | |
| | Social Media on behalf of Director | X | OPA | X |
| | Social Media – YouTube and Vimeo | X | OPA | X |
| | | | | |
| Legislative Report | | | | |
| | | X | LGA | X |
| Policy Statement for External Partners | | | | |
| | Licensing and Certification All Facilities Letter | X | | |
| | Office of Vital Records All County Letter | X | | |
| Prevention/Response Strategic Plan | | | | |
| | Pandemic Influenza Preparedness and Response Plan | X | | X |

| Review and Approval Requirements for Non-Sensitive Documents Intended for External Release | | | | |
|---|--|------------------------------------|--------------|-----------------|
| Document Type | | Review/Approval Requirement | | |
| | | Deputy Director | Other | Director |
| | Examples | | | |
| | California Obesity Prevention Plan | X | | X |
| | California's Master Plan for Heart Disease and Stroke Prevention and Treatment | X | | X |
| Program Description/Evaluation/Annual Report | | | | |
| | Program outcomes report | X | OPA | X |
| | Profile of client populations | X | OPA | |
| | End of year summary or annual report | X | OPA | |
| Regulations | | | | |
| | Revised Drinking Water Standard for Arsenic | X | OOR | X |
| | Testing Standards for Laboratories Performing HIV Screening | X | OOR | X |
| Research/Special Studies | | | | |
| | Abstract for oral or poster presentation | X | | |
| | Manuscript for peer-reviewed journal | X | | |
| | Report of research findings, published by California Department of Public Health | X | | |
| | Oral presentation of previously approved material | X | | |
| | Letter to editor of journal | X | OPA | |
| | Oral presentation of new material | X | | |
| | Chapter in textbook/anthology | X | | |
| | Joint report, developed with another organization | X | | X |
| | Disaster investigation | X | OPA | |
| | Disease cluster investigation | X | OPA | |
| | Risk factor study | X | OPA | |
| Survey Results | | | | |
| | California Behavioral Risk Factor Survey | X | | |
| | California Women's Health Survey | X | | |
| | California WIC Participant Food Shopping and Consumption Habits Survey | X | | |
| Testimony | | | | |
| | Congress | X | LGA | X |
| | State Legislature | X | LGA | X |
| | Local government board, council, or commission | X | LGA | X |

IA: Internal Audits

LGA: Legislative and Governmental Affairs

OOR: Office of Regulations

OPA: Office of Public Affairs

Document Review Checklist

The following checklist provides guidance for reviewing any document prior to final approval by the Deputy Director (non-sensitive documents) or elevating to the next level of review (sensitive documents or those routinely requiring Director approval). Deputy

Directors should maintain a completed copy of this checklist for every document for which they provide final approval for external release.

| Document Review Checklist | | |
|---|--------------------------|--------------------------|
| Name of Document Reviewed: | | |
| Reveiwed by: | Date: | |
| | YES | NO |
| Is the scientific and technical quality of the document acceptable? | <input type="checkbox"/> | <input type="checkbox"/> |
| Is the editorial quality of the document acceptable? | | |
| <ul style="list-style-type: none"> Are grammar, style and spelling consistent with proper English usage and the Chicago Manual of Style? | <input type="checkbox"/> | <input type="checkbox"/> |
| <ul style="list-style-type: none"> Is the document logical, internally consistent, and factually based? | <input type="checkbox"/> | <input type="checkbox"/> |
| <ul style="list-style-type: none"> Is the level of writing appropriate for the intended audience? | <input type="checkbox"/> | <input type="checkbox"/> |
| Is the release of the document consistent with the mission of CDPH and the originating program? | <input type="checkbox"/> | <input type="checkbox"/> |
| Is the document appropriate for the intended audience? | <input type="checkbox"/> | <input type="checkbox"/> |
| Does the document address sensitive issues? | | |
| <ul style="list-style-type: none"> mandated by the Legislature, an auditing entity, or other entity outside CDPH | <input type="checkbox"/> | <input type="checkbox"/> |
| <ul style="list-style-type: none"> makes explicit or implicit policy recommendations | <input type="checkbox"/> | <input type="checkbox"/> |
| <ul style="list-style-type: none"> makes recommendations that have a fiscal impact | <input type="checkbox"/> | <input type="checkbox"/> |
| <ul style="list-style-type: none"> likely to attract media attention or subject to ongoing media interest | <input type="checkbox"/> | <input type="checkbox"/> |
| <ul style="list-style-type: none"> recent or pending legislation or hearings related to the subject of the document or otherwise likely to attract legislative interest | <input type="checkbox"/> | <input type="checkbox"/> |
| <ul style="list-style-type: none"> addresses sensitive or controversial issues | <input type="checkbox"/> | <input type="checkbox"/> |
| Is the fiscal impact (to CDPH, the State, stakeholders, or others) accurately and objectively addressed in the document? | <input type="checkbox"/> | <input type="checkbox"/> |
| If appropriate, has the Office of Legal Services reviewed the document? | <input type="checkbox"/> | <input type="checkbox"/> |
| Have appropriate permissions been obtained? | | |
| <input type="checkbox"/> Copyright permission <input type="checkbox"/> Not needed | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> IRB approval <input type="checkbox"/> Not needed | <input type="checkbox"/> | <input type="checkbox"/> |
| Has authorship been properly attributed? | <input type="checkbox"/> | <input type="checkbox"/> |
| Is review/approval by other CDPH programs needed? | <input type="checkbox"/> | <input type="checkbox"/> |
| If yes, routing: | | |
| Is review/approval by other state Departments/Agencies needed? | <input type="checkbox"/> | <input type="checkbox"/> |
| If yes, routing: | | |
| Is cross-approval outside state government needed? | <input type="checkbox"/> | <input type="checkbox"/> |
| If yes, routing: | | |
| Is the document and/or the issue it addresses newsworthy? | <input type="checkbox"/> | <input type="checkbox"/> |
| Attachments | | |
| <input type="checkbox"/> Institutional Review Board approval <input type="checkbox"/> Chain of approval sign-off sheet <input type="checkbox"/> Sign-off sheet for cross-approval by parallel chain of command (e.g., another State Department) | | |

Disseminating Approved Documents

Deputy Directors must submit monthly to the Director and the Office of Public Affairs (OPA) a list of documents that the Deputy Director or his or her designee approved for external release or submission to a peer-reviewed journal. The purpose of this list is to keep the Director and OPA aware of information about which they may encounter questions. If press inquiries are anticipated, the Deputy Director should consult with OPA regarding the need for talking points to help respond to the press.

Deputy Directors must submit a Week Ahead Report item alerting the Director and California Health and Human Services of the impending public release of any document likely to garner attention.

Public Interest

Managers should consult with OPA to determine how to disseminate documents they deem to be of significant public interest. Prior to public release, the appropriate level of review and approval, as established in this manual, must be obtained.

To Whom Dissemination is Required, Desired, or Permitted

- Distribute in accordance with legal requirements; e.g., California Environmental Quality Act requirements and Records Retention requirements.
- Distribute to the Director, Deputy Directors, Legislative and Governmental Affairs, and other interested parties within CDPH.
- Distribute to identified stakeholders or constituencies.
- Distribute to other affected or interested governmental agencies. NOTE: Permissible disclosure of personally identifying information with other governmental agencies is governed by the Information Practices Act. Consult your attorney regarding requirements affecting disclosure to other governmental agencies.
- Post on appropriate CDPH web site(s), including the Health Publications Portal.
- Distribute to libraries. See the discussion that follows.

Library Distribution

The Library Distribution Act (Government Code sections 14900 through 14912), governs the distribution of state publications. The State Administrative Manual (SAM), sections 3100-3161, provides guidelines to help state agencies comply with the Act. CDPH programs disseminating documents that have been approved for external release must comply with the Act and SAM. Consider the following, in accordance with the Act and SAM:

- Determine whether library distribution is required. Distribution is usually required for documents with lasting interest and use to public, general interest, or interest

to only a few people but spread over a wide geographical area. These documents include:

- research reports
- annual reports
- materials about agency programs
- budget and financial reports
- compilations of laws and regulations
- periodicals
- hearing transcripts
- consumer information publications
- Determine to which libraries distribution is required or recommended, e.g., the State Library, county libraries, law libraries, and libraries in affected and interested communities. See SAM section 3125 for more information.
- Determine the medium of distribution, e.g., printed copy or electronic transmission (Internet link, disk, etc.).

Additional information on the Library Distribution Act is provided in the brochure “The California State Depository Library Program: 5 Ws (and an H), A Guide for State Agencies,” available from the California State Library at (916) 654-0266.

Reasonable Modification/Alternate Formats

CDPH will provide, upon request, reasonable modification, pursuant to Section 504 of the Rehabilitation Act and the Americans with Disabilities Act (ADA) of 1990.

The Office of Civil Rights (OCR) can assist CDPH programs in providing materials in alternate formats, such as Braille, large print, audiocassette, or computer disk.

To facilitate requests for reasonable modification, every document that is to be publicly disseminated should include language similar to the following:

To obtain a copy of this document in an alternate format, please contact:

California Department of Public Health

(Program name)

(Program address)

(Program telephone number)

(Program fax number)

(Program TYY number, if available)

or

CA Relay Service at 1-800-735-2929

Please allow at least 10 working days to coordinate alternate format services.

To ensure consistency in responding to reasonable modification requests, email requests to Office of Civil Rights at “Civil Rights-RA.”